

FEB 22 2018

ATTACHMENT A**Statement of Facts: Carlos Alfredo Garay-Ramirez**AT GREENBELT
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND
DEPUTY

The undersigned parties hereby stipulate and agree that if this matter had gone to trial, the Government would have proven the following facts beyond a reasonable doubt. The undersigned parties also stipulate and agree that the following facts do not encompass all of the evidence that would have been presented had this matter gone to trial.

On or about February 10, 2017, the Defendant, **CARLOS ALFREDO GARAY-RAMIREZ** ("**GARAY-RAMIREZ**"), knowingly and willfully obstructed, delayed, and affected commerce and the movement of an article and commodity in commerce by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), by the unlawful taking of property from the person and presence of another, against his will, by means of actual and threatened force, violence, and fear of injury.

On February 10, 2017, at approximately 3:00 a.m., Company A, a taxi dispatch service, dispatched Victim A, a driver for Company A, to the Dunkin Donuts located at 2405 Reddie Drive, Wheaton, Maryland. **Co-Conspirator 1** entered the front passenger seat of Victim A's car, while **GARAY-RAMIREZ** and **Co-Conspirator 2** entered the rear seat. **Co-Conspirator 2** directed Victim A to drive toward Twinbrook Parkway in Rockville, Maryland, and then turn onto Crawford Drive, a dead-end street, and drive to the parking lot for Hillcrest Park. Once Victim A parked, **GARAY-RAMIREZ** grabbed Victim A and put Victim A in a headlock. **Co-Conspirator 1** pressed a knife to Victim A's stomach and demanded Victim A's wallet and other valuables. **Co-Conspirator 2** pressed a knife to Victim A's cheek. **Co-Conspirator 2** grabbed Victim A's phone and demanded that Victim A provide the passcode, which Victim A did. **GARAY-RAMIREZ** took U.S. currency from the pocket of the driver's side door and demanded Victim A's watch. Victim A felt a sharp object on the side of his neck and sustained a cut to his hand when **GARAY-RAMIREZ** took his watch. **GARAY-RAMIREZ**, **Co-Conspirator 1**, and **Co-Conspirator 2** searched Victim A's car and stole approximately \$350 in United States currency (representing payments Victim A had received from passengers), along with Victim A's gold chain, gold-colored watch, Apple iPhone, and credit card. **GARAY-RAMIREZ**, **Co-Conspirator 1**, and **Co-Conspirator 2** then fled on foot into the park. After the robbery, Victim A did not take any more passengers, although his shift had not yet ended. At approximately 4:30 a.m., **GARAY-RAMIREZ**, **Co-Conspirator 1**, **Co-Conspirator 2**, and **Co-Conspirator 3** used Victim A's credit card to make a purchase at the 7-Eleven convenience store located at 8202 Georgia Avenue, Silver Spring, Maryland.

Company A generally, and Victim A specifically, operate in interstate commerce by driving passengers from Maryland to DC and/or Virginia.

I have read this statement of facts, and have carefully reviewed it with my attorney. I acknowledge that it is true and correct.

2-14-18
Date

Carlos Ramirez
Carlos Alfredo Garay-Ramirez

I am the attorney for Carlos Alfredo Garay-Ramirez. I have carefully reviewed the statement of facts with him.

2/14/18
Date

C22
Christopher C. Nieto, Esq.